

EXHIBIT “1”

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Attorneys for Plaintiffs and the Putative Class

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)**

TERRY SAIDEL and GINA FONG, individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

CBS RADIO, INC., a Delaware Corporation;
CBS Corporation, a Delaware Corporation;
INFINITY BROADCASTING, INC., a
Delaware Corporation; VIACOM, INC., a
Delaware Corporation; and DOES 1 through 10,
inclusive,

Defendants.

Case No. C07-029848 SC

**PLAINTIFFS' FIRST AMENDED
SPECIAL INTERROGATORIES, SET ONE**

Complaint filed: May 3, 2007

Trial Date: None set

1 **PROPOUNDING PARTY: Plaintiffs TERRY SAIDEL and GINA FONG**

2 **RESPONDING PARTY: Defendant CBS RADIO, INC.**

3 **SET NUMBER: ONE**

4 Plaintiffs TERRY SAIDEL and GINA FONG demand that Defendant CBS (as defined
5 below), respond to this set of Specially Prepared Interrogatories within 30-days, at 605 "C" Street,
6 Suite 200, San Diego, California 92101 pursuant to Federal Rules of Civil Procedure, rule 33(b)(3).

7 **DEFINITIONS**

8 **ACCOUNT EXECUTIVES** refers to any and all account executives, senior account
9 executives, regional account executives, and national account executives who worked at any CBS
10 owned, managed, or controlled radio station(s) within the State of California at any time during the

11 **COVERED PERIOD.**

12 **CBS** refers to CBS Radio, Inc., its corporate predecessors and affiliates with respect to the
13 matters at issue in this case (including INFINITY BROADCASTING, INC., and VIACOM, INC.),
14 radio stations owed or operated by CBS within the State of California during the **COVERED**
15 **PERIOD**, their agents, employees, attorneys, accountants, investigators, and anyone else acting on
16 their behalf.

17 **COVERED PERIOD** refers to the time period from and including May 3, 2003 through
18 the date of **CBS's** final response to these requests except as otherwise indicated.

19 **DOCUMENT** means a writing as defined in Federal Rule of Evidence 1001(1), and
20 includes the original or a copy of handwriting, typewriting, printing, photostating, photographing,
21 and every other means of recording upon any tangible thing and form of communicating or
22 representation, including electronic files or data, letters, words, pictures, sounds or symbols, or
23 combination of them) and other tangible things which support your denial or special or affirmative
24 defense, and state the name, **ADDRESS**, and telephone number of the **PERSON**.

25 **IDENTIFY ALL INDIVIDUALS** means list the name, CBS radio station(s) and/or
26 addresses where employed, last known address and home telephone number.

27 ///

28 ///

IDENTIFY ALL DOCUMENTS means provide the name of the **DOCUMENT's** author, the date of the **DOCUMENT**, all identified recipients of the **DOCUMENT**, and a general description of the **DOCUMENT** and its subject matter.

PERSON shall refer to any person, corporation, business entity or otherwise.

INTERROGATORIES

SPECIAL INTERROGATORY NO. 1:

IDENTIFY ALL INDIVIDUALS who are currently employed as a **ACCOUNT EXECUTIVES** by **CBS** in California.

SPECIAL INTERROGATORY NO. 2:

IDENTIFY ALL INDIVIDUALS who have served as a **ACCOUNT EXECUTIVES** for **CBS** in California during the **COVERED PERIOD** but who are no longer employed in that position by **CBS**.

SPECIAL INTERROGATORY NO. 3:

IDENTIFY ALL INDIVIDUALS who are currently employed by **CBS** and who served as immediate supervisors of **ACCOUNT EXECUTIVES** in California during the **COVERED PERIOD**.

SPECIAL INTERROGATORY NO. 4:

IDENTIFY ALL INDIVIDUALS who are no longer employed by **CBS** but who served as immediate supervisors of **ACCOUNT EXECUTIVES** in California during the **COVERED PERIOD**.

SPECIAL INTERROGATORY NO. 5:

For each of **CBS's** responses to Request for Admissions, Set One, that is not an unconditional admission, state the number of the Request and all facts upon which **CBS** bases its response to that request.

SPECIAL INTERROGATORY NO. 6:

For each of **CBS's** responses to Request for Admissions, Set One, that is not an unconditional admission, state the number of the Request and **IDENTIFY ALL INDIVIDUALS** who have knowledge of the facts upon which **CBS** bases its response to that request.

SPECIAL INTERROGATORY NO. 7:

For each of CBS's responses to Request for Admissions, Set One, that is not an unconditional admission, state the number of the Request and **IDENTIFY ALL DOCUMENTS** that form the bases for the facts upon which CBS bases its response to that request.

DATED: August 22, 2007

HINTON, ALFERT & SUMNER

By: 
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ATTORNEYS FOR PLAINTIFFS

PROOF OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is 1646 N. California Blvd., Suite #600, Walnut Creek, California 94596. On August 22, 2007, I served the within documents:

PLAINTIFFS' FIRST AMENDED SPECIAL INTERROGATORIES, SET ONE

() by transmitting via facsimile the document(s) listed above to the fax number(s) set for below on this date before 5:00 p.m.

() by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Walnut Creek, California, addressed as set forth below.

(X) by having personally delivered the document(s) listed above to the person(s) at the address(es) set forth below.

BY US MAIL

Mike Baller
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Fax Number: (510) 835-1417

BY US MAIL

Michael D. Singer
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BY PERSONAL SERVICE

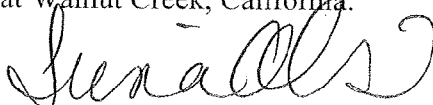
Rebecca Eisen
Morgan Lewis & Bockius LLP
One Market Street,
Spear Street Tower
San Francisco, CA 94105
Fax Number: (415) 442-1001

BY US MAIL

Daryl S. Landy
Morgan, Lewis & Bockius LLP
2 Palo Alto Square
3000 El Camino Real, suite 700
Palo Alto, CA 94306-2212
Fax Number: (650) 843-4001

I am readily familiar with the business practice at my place of business for collection and processing of correspondence for mailing with the United States Postal Service. Correspondence so collected and processed is deposited with the US Postal Service that same day in the ordinary course of business.

I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed on August 22, 2007, at Walnut Creek, California.


TRINA D. ADKINS